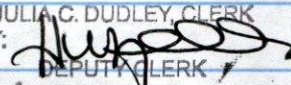


In the United States District Court for the
Western District of Virginia
Charlottesville Division

CLERK'S OFFICE U.S. DIST. COURT
AT CHARLOTTESVILLE, VA
FILED

OCT 18 2021

JULIA C. DUDLEY, CLERK
BY:  DEPUTY CLERK

Sines, et al, Plaintiffs vs. 1
Kessler, et al, Defendants 1 Civil Case No. 3:17-cv-072

Defendant's Objection to Confidentiality Designations

Comes Now, the Defendant, Christopher Cantwell, and, he makes the following objection to confidentiality Designations in this case.

- 1) Cantwell was represented by Counsel when the Confidentiality agreement in this case was reached, and has never actually seen this document.
- 2) Plaintiffs' so-called "expert" reports are so heavily redacted as to make their usefulness questionable, and Cantwell has separately objected, in part, on those grounds.
- 3) Today, 10-12-2021, marks the deadline for objections to all confidentiality designations.
- 4) As noted in myriad other filings, Cantwell has been deprived of access to discovery in this matter until very recently thanks to the actions of Plaintiffs' Counsel and the U.S. Government.

5) Consequently, Cantwell is without sufficient information to determine what is or should be confidential, and, to preserve his rights, hereby objects to all confidentiality designations save for his own.

6) Simultaneously, as Plaintiffs' Counsel Michael Bloch is aware per our phone call moments ago, Cantwell is sensitive to privacy concerns, and prepared to negotiate this issue in good faith, including releasing most of his own designations.

7) Cantwell looks forward to settling the matter between the parties without troubling the court for a decision.

8) This said, trying to determine less than two weeks before trial, what secret evidence remains to be used against him, seems to support Cantwell's separate motion to continue and re-open discovery.

Respectfully Submitted
Christopher Cantwell 10-12-2021

